

# EXHIBIT 11

BRADFORD AUGUSTINE  
1/31/2022

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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HUNTERS CAPITAL, LLC, et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 20-cv-00983-TSZ
	)	
CITY OF SEATTLE,	)	
	)	
Defendant.	)	

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ZOOM 30(b)6 Deposition Upon Oral Examination

Of

MADRONA - BRADFORD AUGUSTINE

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DATE: Monday, January 31, 2022

REPORTED BY: Mindy L. Suurs, CSR No. 2195

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1 A. Okay.

2 Q. Do you want to take a five-minute break, we'll  
3 get that document, and then we can reconvene?

4 MR. REILLY-BATES: Yeah, that's fine.

5 THE VIDEOGRAPHER: The time is 11:41 a.m. We are  
6 off the record.

7 (Recess taken.)

8 THE VIDEOGRAPHER: The time is 11:51 a.m. We are  
9 back on the record.

10 (Exhibit No. 158 marked for  
11 identification.)

12 BY MR. FARMER:

13 Q. Mr. Augustine, we've given you Exhibit 158. Can  
14 you identify this for the record, please?

15 A. Yes, this is a rent roll, which is a  
16 forward-looking document that shows what the tenant pays in  
17 the future and what their base rent is and when the lease  
18 expires.

19 Q. Okay. If we're looking at the first line of  
20 this, do you see the Unicorn Bar & Restaurant?

21 A. I do.

22 Q. And according to this, it said that the lease is  
23 going to run until the end of Confidential; is that correct?

24 A. That's a Confidential. I think it's a Confidential  
25 lease with two 5-year options. I don't believe it's a

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1 Confidential term.

2 Q. Okay. How about the monthly rent? Do you see  
3 it's reflected there as Confidential. Does that sound right  
4 to you?

5 A. Yes, it does.

6 Q. Okay. A moment ago we looked at Exhibit 157,  
7 which is the damages spreadsheet, and we had just looked at  
8 the loss of rent line item on the second page of that,  
9 which came to a total of Confidential. Do you recall that?

10 A. Yes, I do.

11 Q. By my math, that's about eight months of lost  
12 rent. Does that sound right to you?

13 A. No, by my math that's six months of lost rent and  
14 six months potentially of lost CAMS.

15 Q. Okay. And can you explain why the landlord  
16 agreed to give the Unicorn Bar & Restaurant six months of  
17 rent relief?

18 A. Because on the day they were going to reopen,  
19 they called us up and said, We got a problem. There's no  
20 way we're going to be able to open up our outside dining  
21 area under the current situation. And then as time  
22 progressed on into July, they realized that there was no  
23 business coming back based on the fact that there was a  
24 giant scar in the Pike/Pine Urban Neighborhood, and so they  
25 asked for six months of rent relief.

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## REPORTER'S CERTIFICATE

I, Mindy L. Suurs, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010, authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify:

That the foregoing testimony of BRADFORD AUGUSTINE was given before me at the time and place stated therein and thereafter was transcribed under my direction;

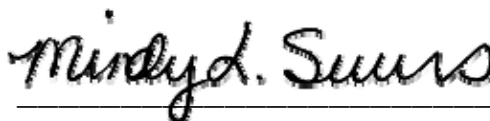
That the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability;

That the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript;

That the witness, before examination, was by me duly sworn to testify the truth, the whole truth, and nothing but the truth;

That I am not a relative, employee, attorney, or counsel of any party to this action or relative or employee of any such attorney or counsel and that I am not financially interested in the said action or the outcome thereof;

DATE: February 1, 2022



Mindy L. Suurs  
Certified Court Reporter #2195

